

EXHIBIT 1

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

Master File No. 12-md-02311
Honorable Marianne O. Battani

In Re: ALL AUTO PARTS CASES

THIS RELATES TO:

All Dealership Actions
All End Payor Actions

**[PROPOSED] ORDER REVERSING IN PART THE SPECIAL
MASTER'S ORDER GRANTING IN PART AND DENYING IN
PART AUTO DEALER PLAINTIFFS' MOTION FOR PROTECTIVE ORDER
CONCERNING RULE 30(B)(6) DEPOSITIONS OF AUTO DEALER PLAINTIFFS**

Upon Defendants' Objections to, and Motion to Reverse in Part and Modify, the Special Master's Order Granting in Part and Denying in Part Auto Dealer Plaintiffs' Motion for Protective Order Concerning Rule 30(b)(6) Depositions of Auto Dealer Plaintiffs and good cause shown, Defendants' Motion is GRANTED, and the Special Master's December 29, 2015 Order (ECF No. 1169) is hereby modified as follows:

1. Section A(7) of the December 29 Order is REVERSED; and
2. Section A(8) of the December 29 Order is REVERSED; and
3. Section A(11) of the December 29 Order is REVERSED IN PART, and Topics 11(c) and 11(g) are appropriate areas of inquiry; and
4. Topics 7, 8, 11(c) and 11(g) are all upheld as appropriate topics for Rule 30(b)(6) depositions of Auto Dealer Plaintiffs.

SO ORDERED.

Dated: _____, 2016

Hon. Marianne O. Battani, U.S. District Judge